### UNITED STATES DISTRICT COURT EASTERN DISTRICT OF PENNSYLVANIA

VICTORIA GRAUDINS, on behalf of herself	)
and all others similarly situated,	) Civil Action No.: 14-02589
	)
Plaintiff,	)
	)
v.	)
	)
KOP KILT, LLC d/b/a/ THE TILTED KILT	)
PUB,	)
	)
Defendants.	)
	)

# PLAINTIFF'S MOTION FOR FINAL APPROVAL OF CLASS AND COLLECTIVE ACTION SETTLEMENT, CERTIFICATION OF SETTLEMENT CLASS, AWARD OF ATTORNEYS' FEES AND REIMBURSEMENT OF EXPENSES AND SERVICE PAYMENT TO PLAINTIFF

Plaintiff Victoria Graudins ("Plaintiff") respectfully requests that the Court enter an Order: (i) granting final approval of the class action settlement; (ii) certifying the Settlement Class; (iii) approving a Service Payment award for Plaintiff; (iv) granting Class Counsel's requested award of attorneys' fees and expenses; and (v) such further and other relief as this Court deems just and proper. Plaintiff is submitting a proposed Final Approval Order attached hereto and incorporated herein. In further support of this Motion, Plaintiff is contemporaneously filing the following:

- (1) Memorandum of Law in Support in Support of Plaintiff's Unopposed Motion for Final Approval and Certification of Settlement Class;
- (2) Memorandum of Law in Support of Plaintiff's Motion for Attorneys' Fees, Reimbursement of Expenses, and Service Payment to Plaintiff; and
- (3) Declaration of Gerald D. Wells, III in Support of Plaintiff's Motion for Final Approval of Class Action Settlement, and exhibits thereto.

By Order entered on April 6, 2016 the Court scheduled the hearing on this Motion for July 21, 2016, at 11:00 a.m. in Courtroom <u>8A</u>, United States District Court for the Eastern District of Pennsylvania, 601 Market Street, Philadelphia, Pennsylvania 19106. At said hearing, Class Counsel will present oral argument in support of this Motion.

Dated: June 21, 2016 Respectfully submitted,

#### CONNOLLY WELLS & GRAY, LLP

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Counsel for Plaintiff and the Settlement Class

## **CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on the 21<sup>st</sup> day of June 2016, a true and correct copy of the foregoing document was filed with the Court utilizing its ECF system, which will send notice of such filing to all counsel of record.

/s/ Gerald D. Wells, III
Gerald D. Wells, III